



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200  
DALLAS, TEXAS 75202-2733

September 25, 2007

Re: Flexible Permit Number

Dear :

The Environmental Protection Agency, Region 6 (EPA) and the Texas Commission on Environmental Quality (TCEQ) have been working together to address the complex issues related to air quality in the State of Texas. One of the areas that we have been focusing on is the development of a federally-approvable flexible permit rule. Although TCEQ has state-approved flexible permit rules in Title 30 of the Texas Administrative Code, Chapter 116, Subchapter G (30 TAC 116.710 et seq.), EPA has not approved these rules into the implementation plan for the State of Texas (Texas SIP). Consequently, permits issued under these flexible permit rules reflect Texas state requirements and not necessarily the federally-applicable requirements.

The purpose of this letter is to clarify that you, as owner or operator of sources included in a TCEQ flexible permit, are obligated to comply with the federal requirements applicable to your plant, in addition to any particular requirements of your flexible permit.

\_\_\_\_\_ was issued Flexible Permit Number 39142, under 30 TAC 116.710 et seq. We recognize that the flexible permit is the State permitting vehicle for certain operational requirements at your plant. However, unless and until such time as the Texas flexible permitting rules become part of the Texas SIP, you must continue to comply with applicable federal requirements, including those in the Texas SIP. This includes all terms and conditions of permits approved under the Texas SIP. An example of what is meant by the reference to "federal requirements" is the emission control limitations (e.g., lbs/MMBtu) and destruction efficiencies together with the associated monitoring and recordkeeping provisions contained in state or federal permits issued under SIP-approved rules.

Enclosed is a list of Frequently Asked Questions regarding this letter and the federal and state permitting programs. Should you have further questions or inquiries, please contact Raymond Magyar of my staff at (214) 665-7288, or Rick Bartley in the Office of Regional Counsel at (214) 665-8046.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "John Blevins", is written over the typed name.

John Blevins  
Director  
Compliance Assurance and  
Enforcement Division

Enclosure

cc: Steve Hagle, Assistant Director, Air Permits Division  
Texas Commission on Environmental Quality

We promote compliance with Federal environmental regulations in partnership with our States and Tribes  
Internet Address (URL) • <http://www.epa.gov/region6/enforcement>

Frequently Asked Questions  
EPA's Fair Notice Letter regarding TCEQ's Flexible Permits

Q1: Purpose of Letter: What is the purpose of the letter?

Response: The purpose of the letter is to remind owners and operators of sources of their obligation to comply with all federal and state air permitting requirements. Both EPA and TCEQ expect sources to operate in compliance with all federal and state air permitting requirements. EPA may enforce the provisions of any permit issued to a source under a SIP-approved process, and it is not bound by changes made to those permits by non-SIP approved mechanisms, such as the current Texas flexible permit provisions. EPA also understands that some emission units covered by flexible permits may no longer be operating in the same manner as they had under previous SIP permits or that new emission units may be covered by a flexible permit that have not previously been permitted under any SIP-approved permitting program. Owners and operators must continue to meet their obligations under the federal Clean Air Act, including the requirement to comply with all federal programs such as the NSPS, NESHAP, PSD, non-attainment NSR, and SIP-approved permits. In particular, the letter reminds the recipient that EPA has not approved the Texas flexible permit rules and, consequently, Texas issued flexible permits are not federally-approved and are not federally-enforceable. More precisely, changes to SIP-approved permits may only be accomplished through SIP-approved procedures, and the flexible permit mechanism is not yet a SIP-approved process to effect changes to a SIP permit.

Q2: Timing of Letter - Why the Sudden Interest? I've had my flexible permit for over 10 years now, why is EPA suddenly concerned about my flexible permit?

Response: TCEQ and EPA both agree that it is now time to focus resources on ensuring that all major sources with the State of Texas have federally-enforceable, SIP-approved permits. The two agencies are working together to develop a flexible permit rule that can be approved as part of the Texas SIP. Both TCEQ and EPA have been aware of issues related to the flexible permit rule and have worked over the last several years to address various permitting issues as part of EPA program revisions, including permit streamlining within the context of Title V, the federal PAL program and NSR reform. Because TCEQ is committed to ensuring the continuing success of its efforts to maintain and improve the air quality of Texas, EPA is providing its assistance to ensure that sources are also meeting their federal obligations under the Clean Air Act. One way for EPA to assist Texas in its efforts is to ensure that there are no adverse air quality impacts associated with the implementation of the flexible permitting rules prior to EPA action on the program.

Q3: Compliance with “legacy permits”: EPA’s letter states that it expects our facility to comply with the SIP-approved permit conditions and terms that existed prior to issuance of our flexible permit. What does that mean for my facility?

Response: EPA maintains that SIP permits issued to a source remain effective until amended, modified, or revoked in accordance with the SIP-approved methods for effecting such permit changes. This means that all SIP permit conditions and terms, including any representations upon which the SIP permit was issued, are not, and have not been, superceded, voided, or replaced by the terms, conditions, or permit application representations associated with a flexible permit. Owners and operators of sources included in a TCEQ flexible permit should review their previously issued SIP permits (“legacy permits”) to ensure that they are complying with those terms, conditions, and representations. To the extent that such conditions, terms and representations were rolled over into the flexible permit, then there should be no issue associated with compliance obligations and the source should simply continue to comply with those requirements. However, EPA understands that there may be some instances where specific terms, conditions, or representations made in the legacy permits have been “modified” or “changed” by the flexible permit. Therefore, in accordance with EPA’s policy entitled “Revised Guidance on Enforcement During Pending SIP Revisions,” (<http://www.epa.gov/compliance/resources/policies/civil/caa/stationary/enf-siprev-rpt.pdf>) dated March 1, 1991, EPA will assess its enforcement options on a case-by-case basis.

Q4: New Units Not Covered by a SIP Permit: I was issued a flexible permit for a new source (site) or a new or amended flexible permit for a change to a source (site) that involves construction of a new unit. Is the source operating in violation of federal requirements since it obtained authorization for those emissions in a non SIP-approved permit?

Response: To the extent that the modification followed the federally-approved review requirements *but for* the inclusion of those requirements in a SIP-approved permit, EPA will look to the 1991 guidance referenced above in determining whether or not to bring an enforcement action for failure to effect changes to the source in accordance with approved SIP procedures. As previously mentioned in response to Q2, EPA’s focus will be to ensure that the source is not creating any adverse air quality impacts as a result of its operations under the flexible permit. In addition, if there is a need for changes to the monitoring, record-keeping, or reporting requirements to ensure no adverse air quality impacts, then an EPA enforcement action to effect those changes may be appropriate under the circumstances.



Permit 71623 (BQ0009S, RN100219005)  
Ms. Wendy Reno  
Advanced Environmental Engineer  
3M Company  
P.O. Box 33331  
Saint Paul, MN 55133-3331

Permit 56233 (LA0005R, RN100216753)  
Mr. Dennis Dawson  
Company Contact  
Campbell Soup Supply Company LLC  
P.O. Box 9016  
Paris, TX 75461

Permit 4437A (HG0566H, RN102018322)  
Mr. John E. Hellstrom  
Environmental Superintendent  
Chevron Phillips Chemical Company LP  
P.O. Box 792  
Pasadena, TX 77501-0792

Permit 56685 (JE0016C, RN100225671)  
Mr. Lee Murphy  
Vice President Manufacturing  
850 Pine Street Inc.  
P.O. Box 20918  
Beaumont, TX 77720-0918

Permit 34184 (HG9085L, RN100561182)  
Mr. Tim Butzke  
Facilities Manager  
CB&L Constructors Inc  
8900 Fairbanks N Houston  
Houston, TX 77064

Permit 22690 (BL0758C, RN100825249)  
Ms. Elena Lancione  
Environmental Team Leader  
Chevron Phillips Chemical Company LP  
21689 Highway 35  
Old Ocean, TX 77463

Permit 21865 (HG0037Q, RN100211523)  
Mr. Paul Mikutis  
Environmental Manager  
Akzo Nobel Chemicals Inc.  
13000 Baypark Rd.  
Pasadena, TX 77507-1104

Permit 27244 (GH0004O, RN101996395)  
Mr. Ken May  
Site Director  
Celanese Ltd.  
P.O. Box 937  
Pampa, TX 79066-0937

Permit 78189 (ML0088P, RN102194271)  
Mr. J. Gregg Wheeler  
Senior Lease Trader  
Chevron Products Company  
15 Smith Rd., Rm. 1225  
Midland, TX 79705

Permit 50595 (TA0021L, RN100214949)  
Mr. Weinan Chen, PhD  
Senior Environmental Engineer  
Alon USA LP  
P.O. Box 1311  
Big Spring, TX 79721-1311

Permit 56396 (, RN101485597)  
Mr. Ken Bartels  
Operations Manager  
Chemcentral Southwest LP  
11235 FM 529  
Houston, TX 77041

Permit 56151 (BG0098G, RN101073013)  
Mr. Lane Tolar  
Environmental Safety and Security Manager  
Citgo Petroleum Corporation  
12325 North Freeway  
Houston, TX 77060

Permit 36845 (HT0011Q, RN100250869)  
Mr. Joseph A. Conciene III  
Vice President and Refinery Manager  
Alon USA LP  
P.O. Box 1311  
Big Spring, TX 79721-1311

Permit 70652 (HG0979B, RN102341880)  
Mr. Ken Bartels  
Regional Operations Manager West Region  
Chemcentral Southwest LP  
10235 W. Little York, Suite 350  
Houston, TX 77040

Permit 1889A (HG0246F, RN100219260)  
Mr. Lane Tolar  
ES Manager SW Terminal Operations  
Citgo Petroleum Corporation  
12325 N Freeway  
Houston, TX 77060-1705

Permit 47724 (SK0016S, RN101162774)  
Mr. Doug Hunsley  
Business Leader  
American Standard Inc.  
6200 Troup Hwy.  
Tyler, TX 75707

Permit 32468 (HG3143S, RN102904794)  
Mr. Charles Daigle  
Environmental Manager  
Chemical Research & Licensing Company  
10100 Bay Area Blvd.  
Pasadena, TX 77507

Permit 56121 (HF0025L, RN100224088)  
Mr. Robert Bertrand  
Transportation Safety & Environmental  
Specialist  
Citgo Pipeline Company  
P.O. Box 1424  
Lake Charles, LA 70602-1424

Permit 81593 (NE0024E, RN100642040)  
Mr. Dale Lebsack  
Operations & EHS  
Barney M. Davis LP  
2705 Bee Caves Rd., Suite 340  
Austin, TX 78746-5689

Permit 50478 (CI0052O, RN100918754)  
Mr. Ashok K. Moza  
President  
Chemicals Incorporated  
12321 Hatcherville Road  
Baytown, TX 77521-7700

Permit 56218 (TA0034C, RN100225739)  
Mr. Ken Holtgreve  
Safety and Environmental Manager  
Citgo Products Pipeline Company  
P.O. Box 1410  
Eules, TX 76039-1410

Permit 7278 (HX0055V, RN102528197)  
Mr. Jay Brough  
Hsse Manager  
BP Amoco Chemical Company  
P.O. Box 2016  
Pasadena, TX 77501-2016

Permit 32713 (JE0508W, RN100209857)  
Mr. R. T. Cuneo  
Plant Manager  
Chevron Phillips Chemical Company LP  
P.O. Box 1547  
Port Arthur, TX 77641-1547

Permit 80693 (NE0027V, RN102555166)  
Mr. David Dear  
Manager of Health Security Safety &  
Environmental  
Citgo Refining and Chemicals Company LP  
P.O. Box 9176  
Corpus Christi, TX 78469-9176

Permit 1176 (GB0001R, RN102536307)  
Mr. Ruben Herrera, P.E.  
Senior Air Quality Engineer  
BP Amoco Chemical Company  
P.O. Box 401  
Texas City, TX 77592-0401

Permit 21918 (HW0013C, RN102320850)  
Mr. John M. Edgington  
Environmental Representative  
Chevron Phillips Chemical Company LP  
P.O. Box 968  
Borger, TX 79008-0968

Permit 80810 (NE0192F, RN100238799)  
Mr. David Dear  
Manager of Health Security Safety &  
Environmental  
Citgo Refining and Chemicals Company LP  
P.O. Box 9176  
Corpus Christi, TX 78469-9176

Permit 47256 (GB0004L, RN102535077)  
Ms. Katherine Gardner  
Environmental Manager  
BP Products North America Inc.  
P.O. Box 401  
Texas City, TX 77592-0401

Permit 583A (OC0012Q, RN100215615)  
Mr. Earl R. Geis  
EHS Manager  
Chevron Phillips Chemical Company LP  
P.O. Box 7400  
Orange, TX 77631-7400

Permit 71739 (, RN104222278)  
Mr. Greg Platt  
Vice President  
Cobisa-Greenville Limited Partnership  
820 Gessner, Suite 930  
Houston, TX 77024-4258



Permit 80806 (BL0042G, RN101619179)  
Ms. Cynthia Wyman Jordy  
Environmental Team Leader  
ConocoPhillips Company  
P.O. Box 866  
Sweeny, TX 77480

Permit 18287 (HG0232Q, RN102579307)  
Mr. CW Chris Erickson  
Refinery Manager  
Exxon Mobil Corporation  
P.O. Box 4004  
Baytown, TX 77522-4004

Permit 8996 (ED0099J, RN100219286)  
Mr. Michel Moser  
Plant Manager  
Holcim (Texas) Limited Partnership  
1800 Dove Lane  
Midlothian, TX 76065-4435

Permit 9868A (HW0018P, RN102495884)  
Ms. Joann Wasicek  
Environmental Team Leader  
ConocoPhillips Company  
P.O. Box 271  
Borger, TX 79008-0271

Permit 49138 (JE0067I, RN102450756)  
Mr. W. S. Stewart  
Environmental Coordinator Refinery and  
Chemicals Complex  
ExxonMobil Oil Corporation  
P.O. Box 3311  
Beaumont, TX 77704-3311

Permit 2167 (HG0048L, RN100218130)  
Mr. Philip J. Oberbroeckling  
Manager Environmental and DOT Affairs  
Houston Refining LP  
12000 Lawndale, P.O. Box 2451  
Houston, TX 77252-2451

Permit 18330 (DB0242V, RN100216779)  
Mr. Chad Welding  
General Manager Dallas Manufacturing  
Dal-Tile Corporation  
7834 C F Hawn Fwy  
Dallas, TX 75217-6529

Permit 292 (OC0010U, RN100224468)  
Mr. Ernest Pace  
Plant Manager  
Firestone Polymers LLC  
P.O. Box 1269  
Orange, TX 77631

Permit 18105 (HH0171A, RN101618759)  
Mr. Dennis P. Leahey  
EHS Manager  
Huntsman LLC  
118 Huntsman Way  
Longview, TX 75602

Permit 9708 (MR0008T, RN100210517)  
Mr. John Deemer  
Environmental Manager  
Diamond Shamrock Refining Company LP  
6701 FM 119  
Sunray, TX 79086-2013

Permit 6308 (NE0120H, RN102534138)  
Ms. Janice A. Golden  
Environmental Manager  
Flint Hills Resources LP  
P.O. Box 2608  
Corpus Christi, TX 78403-2608

Permit 16989 (JE0135Q, RN100217389)  
Mr. Glenn Senters  
Plant Manager  
Huntsman Petrochemical Corporation  
P.O. Box 847  
Port Neches, TX 77651-0847

Permit 50607 (LK0009T, RN100542802)  
Mr. Jon Kiggans  
HS&E Director  
Diamond Shamrock Refining Company LP  
P.O. Box 490  
Three Rivers, TX 78071-0490

Permit 8803A (NE0122D, RN100235266)  
Ms. Janice A. Golden  
Environmental Manager  
Flint Hills Resources LP  
P.O. Box 2608  
Corpus Christi, TX 78403-2608

Permit 82132 (, RN104620083)  
Mr. Ron Deakins  
Chief Operating Officer  
INEOS Americas LLC  
7770 Rangeline Rd.  
Theodore, AL 36582-5212

Permit 664 (EA0006G, RN100217306)  
Mr. Earl T. Bradley  
Chief Operations Officer  
EBAA Iron Inc.  
P.O. Box 877  
Eastland, TX 76448

Permit 6606 (SD0047K, RN100222744)  
Mr. Eric R. Kaysen, P.E.  
Environmental Manager  
Flint Hills Resources LP  
P.O. Box 2608  
Corpus Christi, TX 78403-2608

Permit 49823 (HG0665E, RN100229905)  
Mr. Guy Hagen  
Manager SHE Department  
INEOS Polyethylene North America  
1230 Battleground Rd.  
La Porte, TX 77571

Permit 76165 (, RN104477161)  
Mr. Tyrone G. Chichester  
She Consultant  
El Du Pont De Nemours And Company  
Route 130  
Deepwater, NJ 08023

Permit 19079 (TH0310Q, RN101059673)  
Mr. H. Scott Peters  
Environmental Engineer  
Flint Hills Resources LP  
P.O. Box 2608  
Corpus Christi, TX 78403-2608

Permit 28351 (HX2897U, RN102537289)  
Mr. Guy Hagen  
Manager SHE Department  
INEOS Polymers Inc.  
1230 Battleground Rd.  
La Porte, TX 77571

Permit 76070 (CI0008R, RN102323268)  
Mr. T. Helfgott, PhD  
Vice President Environmental Administration  
Enterprise Products Operating LP  
P.O. Box 4324  
Houston, TX 77210-4324

Permit 74599 (, RN104277793)  
Mr. Allan Young  
North America Manufacturing Manager  
Forbo Adhesives LLC  
P.O. Box 110447  
Triangle Park, NC 27709-0447

Permit 95 (BL0002S, RN100238708)  
Mr. Randall W. Browning  
Manager SHE Department  
INEOS USA LLC  
P.O. Box 1488  
Alvin, TX 77512-1488

Permit 3452 (HG0228H, RN102212925)  
Mr. Adam Cantu II  
Environmental Section Supervisor  
Exxon Mobil Corporation  
5000 Bayway Dr.  
Baytown, TX 77522

Permit 18495 (WA0041A, RN100242973)  
Mr. Charlie Kuhn  
Plant Manager  
Gardner Glass Products Inc.  
7553 Hwy. 75 S  
Huntsville, TX 77340-2485

Permit 74630 (SG0004S, RN101302362)  
Mr. Scott Muston  
Pipeline Operations Manager  
Kinder Morgan Wink Pipeline LP  
500 N. Loraine St., Suite 900  
Midland, TX 79701

Permit 20211 (HG0229F, RN102574803)  
Mr. Adam Cantu II  
Environmental Section Supervisor  
Exxon Mobil Corporation  
P.O. Box 4004 Cab W-118  
Baytown, TX 77522-4004

Permit 6081 (DB0386T, RN100683010)  
Mr. Jay Poppleton  
President of JT Walker Industries Inc.  
General Aluminum Company of Texas LP  
P.O. Box 4490  
Clearwater, FL 33758-4490

Permit 2193 (HG0262H, RN100237452)  
Mr. James Wilson  
Manager EHS  
KM Liquids Terminals LP  
906 Clinton Dr.  
Galena Park, TX 77547-3461



Permit 19082 (BG0488M, RN101058733)  
Mr. Michael R. Hallgarth  
Environmental Compliance Manager  
Koch Petroleum Group Inc.  
8606 I-37  
Corpus Christi, TX 78409

Permit 70042 (HG0735I, RN102186129)  
Mr. Jay Wiese  
Vice President of Terminal Services &  
Development  
Magellan Terminals Holdings LP  
P.O. Box 22186, One Williams Ctr., MD 28-2  
Tulsa, OK 74121

Permit 40972 (HG0658B, RN100211259)  
Mr. Daniel Porras  
Regional Manager  
Motiva Enterprises LLC  
P.O. Box 2463  
Houston, TX 77252-2463

Permit 39863 (WF0046E, RN100542562)  
Don Cobb  
Vice President of Manufacturing  
Leedo Manufacturing Co LP  
P.O. Box 520  
East Bernard, TX 77435

Permit 22433 (GB0055R, RN100210608)  
Mr. Steve Willis  
Environmental and Safety Manager  
Marathon Petroleum Company LLC  
502 10th St. S  
Texas City, TX 77590

Permit 37200 (TA0345F, RN100216548)  
Mr. Don Porras  
Regional Manager  
Motiva Enterprises LLC  
P.O. Box 2463  
Houston, TX 77252-2463

Permit 77410 (WF0046E, RN100542562)  
Mr. Jim Hirt  
Vice President  
Leedo Manufacturing Co LP  
100 Foundation Loop  
East Bernard, TX 77435

Permit 76962 (, RN104761606)  
Mr. S. M. Brooks  
President  
Midway Industrial Park LLC  
P.O. Box 550  
Nash, TX 75569

Permit 77679 (, RN103219127)  
Mr. Frank W. Getman, Jr.  
President  
Nacogdoches Power LLC  
1 New Hampshire Ave., Suite 125  
Portsmouth, NH 03801

Permit 16862 (TA0156K, RN100212356)  
Mr. Bob Kramer  
Senior Environmental Engineering Specialist  
Lockheed Martin Corporation dba Lockheed  
Martin Aeronautics Company  
P.O. Box 748 MZ6875  
Fort Worth, TX 76101-7450

Permit 22104 (HG4873N, RN100219161)  
Mr. Don La Ferriere  
Environmental Analyst  
Mitsubishi Caterpillar Forklift America Inc.  
2011 W. Sam Houston Pkwy. N.  
Houston, TX 77043

Permit 17210 (HG1413D, RN100213545)  
Mr. Gary Penn  
Environmental Manager  
NCI Building Systems, L.P.  
7301 Fairview  
Houston, TX 77041

Permit 38082 (EB0839J, RN102416799)  
Mr. Carter Montgomery  
President & CEO  
Longhorn Partners Pipeline  
1801 North Lamar Street 100  
Dallas, TX 75202

Permit 48662 (JE0870C, RN102530268)  
Ms. Lynn Courville  
Terminal Manager  
Motiva Enterprises LLC  
P.O. Box 1918  
Pasadena, TX 77501

Permit 24679 (ME0019O, RN102771078)  
Ms. Anastasia Tullos  
Regional Environmental Coordinator  
Norbord Texas Jefferson Inc.  
1194 Highway 145  
Guntown, MS 38849

Permit 51770 (FC0018G, RN100226844)  
Mr. Kenneth W. Taylor  
Plant Manager  
Lower Colorado River Authority  
6549 Power Plant Road  
La Grange, TX 78945-3714

Permit 8404 (JE0095D, RN100209451)  
Ms. Nikole S. Jenkins  
Environmental Manager - Refinery Expansion  
Motiva Enterprises LLC  
P.O. Box 712  
Port Arthur, TX 77641-0712

Permit 9958 (NA0017W, RN100543040)  
Mr. Jim Ward  
General Manager  
Norbord Texas Nacogdoches Inc.  
P.O. Box 632750  
Nacogdoches, TX 75963-2750

Permit 56340 (RI0016G, RN100220011)  
Mr. Rick Olson  
Vice President of Pipeline Operations  
Magellan Pipeline Company LP  
P.O. Box 22186, One Williams Ctr., MD 28-2  
Tulsa, OK 74121

Permit 19035 (BG0218U, RN100519214)  
Mr. Roger P. Leitch  
Regional Manager  
Motiva Enterprises LLC  
P.O. Box 2099  
Houston, TX 77252-2099

Permit 79255 (FG0020V, RN100888312)  
Mr. Ben C. Carmine, P.E.  
Director Environmental Operations  
NRG Texas LP  
1301 McKinney, Suite 2300  
Houston, TX 77210-0148

Permit 73439 (EE0077I, RN100813492)  
Mr. Greg McMillan  
Environmental Specialist  
Magellan Pipeline Terminals LP  
One Williams Center MD 27-3  
Tulsa, OK 74172

Permit 1285 (DB0795V, RN100519651)  
Mr. Dan Porras  
Regional Manager  
Motiva Enterprises LLC  
P.O. Box 2463  
Houston, TX 77252

Permit 81594 (NE0026A, RN100552181)  
Mr. Dale Lebsack  
Vice President Operations & EHS  
Nueces Bay WLE LP  
2705 Bee Caves Rd., Suite 340  
Austin, TX 78746

Permit 1296A (PC0011B, RN102183449)  
Mr. James Oneal  
Environmental Supervisor  
Magellan Pipeline Terminals LP  
P.O. Box 22186 MD27-3  
Tulsa, OK 74121-2186

Permit 26638 (HG0715O, RN100226125)  
Mr. Dan Porras  
Regional Manager  
Motiva Enterprises LLC  
P.O. Box 2463  
Houston, TX 77252-2463

Permit 80024 (, RN105082994)  
Ms. Cheryl Longuet  
Office Manager  
Nueces Syngas LLC  
14701 St. Mary's Lane, Suite 625  
Houston, TX 77079

Permit 4850 (HG0017W, RN102180486)  
Mr. Brian Topping  
Air Quality Specialist  
Magellan Terminals Holdings LP  
1 Williams Ctr. MD 27  
Tulsa, OK 74172-0140

Permit 31978 (MB0112K, RN100519636)  
Mr. Daniel Porras  
Regional Manager  
Motiva Enterprises LLC  
P.O. Box 2463  
Houston, TX 77252-2463

Permit 21356 (JE0010O, RN101042885)  
Mr. Shaun Revere  
General Manager  
Oiltanking Beaumont Partners LP  
P.O. Box 96290  
Houston, TX 77213-6290





Permit 5631 (HG0531D, RN100224740)  
Mr. Guillermo Triana  
Environmental and Projects Manager  
Oiltanking Houston LP  
15631 Jacintoport Blvd.  
Houston, TX 77015

Permit 73357 (UB0152N, RN101973782)  
Mr. Wayne E. Roberts  
Director Southern & Southwestern Divisions  
Plains Pipeline LP  
P.O. Box 3371  
Midland, TX 79702-3371

Permit 80987 (PH0021M, RN100812502)  
Mr. Max Holtby  
Senior Geologist  
Rio Grande Mining Company  
1180-999 W. Hastings St.  
Vancouver Canada, BC V6C-2W2

Permit 3284 (GB0077H, RN100217231)  
Mr. Michael Nieberlein  
Health Safety Security Environmental Manager  
Oiltanking Texas City LP  
P.O. Box 29  
Texas City, TX 77592-0029

Permit 73368 (, RN104156526)  
Mr. Wayne E. Roberts  
Director Southern & Southwestern Divisions  
Plains Pipeline LP  
P.O. Box 3371  
Midland, TX 79702-3371

Permit 70861 (, RN104136700)  
Mr. Michael P. Witzing  
Senior Vice President  
Sandy Creek Energy Associates LP  
Two Tower Center, 20th Floor  
East Brunswick, NJ 08816

Permit 72763 (, RN101625192)  
Mr. Wayne E. Roberts  
Environmental Director  
Plains Marketing LP  
P.O. Box 3371  
Midland, TX 79702-3371

Permit 73383 (WM0041L, RN101988541)  
Mr. Wayne E. Roberts  
Director Southern & Southwestern Divisions  
Plains Pipeline LP  
P.O. Box 3371  
Midland, TX 79702-3371

Permit 56496 (HG0659W, RN100211879)  
Mr. Richard W. Bourns  
Environmental Manager  
Shell Chemical LP  
P.O. Box 100  
Deer Park, TX 77536-0100

Permit 72760 (SG0032N, RN101296507)  
Mr. Wayne E. Roberts  
Environmental Director  
Plains Pipeline LP  
P.O. Box 3371  
Midland, TX 79702-3371

Permit 73458 (YA0272O, RN101950616)  
Mr. Wayne E. Roberts  
Director-Environmental & Regulatory  
Compliance  
Plains Pipeline LP  
P.O. Box 3371  
Midland, TX 79702-3371

Permit 21262 (HG0659W, RN100211879)  
Mr. Richard W. Bourns  
Environmental Manager  
Shell Oil Company  
P.O. Box 100  
Deer Park, TX 77536-0100

Permit 72761 (WH0051M, RN102305943)  
Mr. Wayne E. Roberts  
Director S and SW Division Env. & Reg.  
Compliance  
Plains Pipeline LP  
P.O. Box 4648  
Houston, TX 77210-4648

Permit 72712 (ML0244C, RN100214824)  
Mr. Michael J. Tarrillion  
Staff Air Compliance Engineer  
Plains Pipeline LP  
P.O. Box 4648  
Houston, TX 77210-4648

Permit 56253 (JE0228I, RN100219716)  
Mr. Richard W. Lewis  
Shell Pipeline Company LP  
P.O. Box 2648  
Houston, TX 77252

Permit 72762 (ML0029I, RN102662848)  
Mr. Wayne E. Roberts  
Environmental Director  
Plains Pipeline LP  
P.O. Box 3371  
Midland, TX 79702-3371

Permit 74485 (, RN104517826)  
Mr. Marvin L. Ivey  
Project Manager  
Port Arthur LNG LP  
101 Ash St.  
San Diego, CA 92101-3017

Permit 56342 (JE0100M, RN102027174)  
Ms. Michelle R. McCracken  
Environmental Representative  
Shell Pipeline Company LP  
P.O. Box 2648  
Houston, TX 77252

Permit 72983 (WM0039V, RN100214253)  
Mr. Wayne E. Roberts  
Environmental Director Southern &  
Southwestern Divisions  
Plains Pipeline LP  
P.O. Box 3371  
Midland, TX 79702-3371

Permit 1862A (HG0131A, RN102540754)  
Mr. Jeffrey M. Grimes  
Environmental Engineer  
PPG Industries Inc.  
P.O. Box 995  
La Porte, TX 77571

Permit 81029 (, RN105179881)  
Mr. Stephen P. Rosenberg  
President and CEO  
SPR Packaging LLC  
5720 LBJ Fwy., Suite 630  
Dallas, TX 75240-6366

Permit 72984 (CY0016N, RN102575073)  
Mr. Wayne E. Roberts  
Environmental Director Southern &  
Southwestern Divisions  
Plains Pipeline LP  
P.O. Box 3371  
Midland, TX 79702-3371

Permit 19297 (, RN104095435)  
Mr. David Bush  
Plant Manager  
Praxair Inc.  
P.O. Box 1758  
Texas City, TX 77592-1758

Permit 31977 (HH0041O, RN103080966)  
Mr. J. Scott Haggerton  
Field Environmental Specialist  
Star Enterprise  
4500 Fuller Drive, Suite 400  
Irving, TX 75038

Permit 72985 (, RN102459765)  
Mr. Wayne E. Roberts  
Environmental Director Southern &  
Southwestern Divisions  
Plains Pipeline LP  
P.O. Box 3371  
Midland, TX 79702-3371

Permit 21318 (BL0383A, RN101388163)  
Mr. Ed Brauer  
General Manager  
Rangen Inc.  
1500 E. Cedar St.  
Angleton, TX 77515-4141

Permit 53418 (HX1378K, RN102874419)  
Mr. Gary Elkin  
EH&S  
Stewart & Stevenson Services Inc.  
2707 N. Loop West  
Houston, TX 77008

Permit 73198 (CZ0015E, RN102573177)  
Mr. Wayne E. Roberts  
Environmental Director  
Plains Pipeline LP  
P.O. Box 3371  
Midland, TX 79702-3371

Permit 77738 (HG0618N, RN100673136)  
Mr. Mike Fields  
Plant Manager  
Reichhold Inc.  
1503 Haden Road  
Houston, TX 77015

Permit 73416 (MP0007U, RN100212349)  
Mr. Greg P. Yant  
Associate Environmental Specialist  
Sunoco Pipeline LP  
907 S. Detroit Ave.  
Tulsa, OK 74120



Permit 21548 (AH0065E, RN102411352)  
Mr. Richard Botkin  
Vice President Human Resources  
Tactical Vehicle Systems  
P.O. Box 330  
Sealy, TX 77474-0330

Permit 49230 (HG1357L, RN101466159)  
Mr. Charles Nettles, Jr.  
President  
Tex-Trude LP  
2001 Sheldon Road  
Channelview, TX 77530

Permit 20432 (BL0082R, RN100225945)  
Ms. Linda Bartholome  
Responsible Care Leader  
The Dow Chemical Company  
2301 N. Brazosport Blvd., Bldg. APB  
Freeport, TX 77541-3257

Permit 6618 (HG0289K, RN100870898)  
Mr. Michael Lockwood  
Site Manager  
The Goodyear Tire & Rubber Company  
P.O. Box 5397  
Houston, TX 77262

Permit 40933 (SK0021C, RN102456597)  
Mr. Brent McCauley  
Facilities Manager  
The Kelly-Springfield Tire Company  
P.O. Box 4670  
Tyler, TX 75712-4670

Permit 6825A (JE0042B, RN102584026)  
Mr. Jim Gillingham  
Regional Operations Vice President  
The Premcor Refining Group Inc.  
P.O. Box 909  
Port Arthur, TX 77641-0909

Permit 74886 (DB0728N, RN100218197)  
Mr. Mark Bright  
Facility Manager  
The Sherwin-Williams Company  
2802 W. Miller Rd.  
Garland, TX 75041-1211

Permit 20513 (TA2184O, RN100767714)  
Mr. Marshall Seavers  
Plant Manager  
The WW Henry Company LP  
1101 Avenue G E  
Arlington, TX 76011-7715

Permit 81030 (, RN105156707)  
Mr. Fusao Ito  
President  
Toyo Ink International Corporation  
610 5th Ave.  
New York, NY 10020-2403

Permit 48056 (BG0229P, RN100209337)  
Mr. Michael A. Charlton, PhD  
Director Environmental Health and Safety  
University of Texas Health Science Center  
7703 Floyd Curl Dr., MC 7928  
San Antonio, TX 78229-3900

Permit 79097 (EE0024G, RN100210095)  
Mr. Jesus Moncada  
Air Program Manager  
US Department of The Army  
Bldg. 622, S. Taylor Rd., IMSW-BLS-DOE  
Fort Bliss, TX 79916-6816

Permit 54985 (, RN104248141)  
Mr. David Arnosky  
Manager of Environmental Affairs  
Valero Logistics Operations LP  
P.O. Box 3429  
Texas City, TX 77592-3429

Permit 54984 (, RN104276696)  
Ms. Sheary Culp  
Environmental Manager  
Valero Logistics Operations LP  
P.O. Box 696000  
San Antonio, TX 78269-6000

Permit 80493 (HG0130C, RN100219310)  
Mr. Robert L. Gross  
Director Safety And Environmental Affairs  
Valero Refining-Texas LP  
P.O. Box 5038  
Houston, TX 77262-5038

Permit 2937 (NE0043A, RN100211663)  
Mr. Dennis Payne  
Regional Vice President and General Manager  
Valero Refining-Texas LP  
P.O. Box 9370  
Corpus Christi, TX 78469-9370

Permit 38754 (NE0112G, RN100214386)  
Mr. Dennis Payne  
Vice President and General Manager  
Valero Refining-Texas LP  
P.O. Box 9370  
Corpus Christi, TX 78469-9370

Permit 39142 (GB0073P, RN100238385)  
Mr. Leslie G. Rucker  
Director Health Safety and Environmental  
Affairs  
Valero Refining-Texas LP  
P.O. Box 3429  
Texas City, TX 77592-3429

Permit 74272 (, RN104488440)  
Mr. Ray Mentzer  
Authorized Representative  
Vista Del Sol LNG Terminal LP  
12450 Greenspoint Dr., MS DEV-GP6-1220  
Houston, TX 77060

Permit 72302 (, RN104314273)  
Mr. Al Tallman  
President  
Water World Fiberglass Pools (USA) Inc.  
700 Reading Ave.  
Hammonton, NJ 08037

Permit 72661 (SG0033L, RN100215128)  
Mr. David Minielly  
Manager - Health, Environmental Services  
West Texas Gulf Pipe Line Company  
P.O. Box 2039  
Tulsa, OK 74102-2039

Permit 18897 (EE0015H, RN100213016)  
Ms. Leslie Ann Allen  
Vice President of Environmental and Regulatory  
Affairs  
Western Refining Company LP  
6500 Trowbridge Dr.  
El Paso, TX 79905-3402

Permit 43104 (BG1199P, RN100542828)  
Mr. Donnie Zapara  
Vice President  
Zee Manufacturing Ltd.  
4600 W. US Highway 90  
San Antonio, TX 78237-4002